

December 17, 2015

Governor's Office of Planning and Research
Attention: Holly Roberson
1400 Tenth Street
Sacramento, CA 95814

SUBJECT: Southern California Edison Company Comments on the Discussion Draft of Proposed Changes to Appendix G of the CEQA Guidelines Checklist Incorporating Tribal Cultural Resources as Required by Assembly Bill 52

Dear Ms. Roberson:

Southern California Edison Company (SCE) appreciates the opportunity to provide comments to the Governor's Office of Planning and Research (OPR) regarding the *Discussion Draft of Proposed Changes to Appendix G of the CEQA Guidelines Checklist Incorporating Tribal Cultural Resources as Required by Assembly Bill 52* (Discussion Draft).

The Discussion Draft presents three alternative sets of draft Appendix G questions regarding tribal cultural resources. SCE prefers Alternative 1, which provides the simplest and most straight-forward language of the Alternatives presented. Alternative 1 refers to the proper statutory citation, and does not provide additional language regarding Public Resources Code (PRC) 21074, a format consistent with the existing Appendix G Checklist. There is considerable risk of creating inconsistencies when providing summaries and/or interpretations of PRC sections in the Checklist. OPR can reduce the risk of misinterpretations of the CEQA guidelines by cross-referencing relevant PRC sections (the approach taken in Alternative 1) and avoiding unnecessary summaries or rewordings.

For the reasons articulated above, SCE does not prefer Alternatives 2 or 3. Alternatives 2 and 3 do not follow the existing Appendix G Checklist format and, depending on how the language is interpreted, may exacerbate potential inconsistencies between the Checklist and PRC. SCE recommends following the simple approach of utilizing the existing Checklist format and clear reference to PRC 21074 in Alternative 1, and rely on OPR's numerous AB 52 supporting documents to assist in the accurate completion of the Checklist. Should you have any questions, please contact me (Adam.Sriro@sce.com, 626 462-8667) to discuss any of the comments.

Sincerely,



Adam Sriro, M.A., RPA
Manager, Archaeological Resources Section
Southern California Edison Company

cc. Beth Gaylord, Director and Managing Attorney, SCE
David Kay, Manager, Project Environmental Management, SCE
Ken Borngrebe, Manager, Natural and Cultural Resources, SCE